

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATIONS OF  
UNIVERSITY PROFESSORS, ET AL.,

*Plaintiffs,*

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT OF  
STATE, ET AL.,

*Defendants.*

No. 1:25-cv-10685-WGY

**DEFENDANTS' MOTION TO FILE  
OPPOSITION TO MOTION TO COMPEL  
OUT OF TIME**

Now come the Defendants, by and through undersigned counsel, and hereby move this Honorable Court to accept the Defendants' filing of their opposition to Plaintiffs' Motion to Compel. It was due at 6:00 PM, on June 27, 2025. Defendants uploaded their filing to the Court's CM/ECF website at approximately 6:42 PM, on June 27, 2025. As reason therefor, in the process of preparing the motion for filing, a number of technical difficulties that could go wrong, did go wrong, despite our best efforts and expectation for a timely filing. Defendants were therefore unable to file this motion as a request for an extension of time prior to the Court's deadline. Defendants reached out to Plaintiffs for their position on this motion, but given time constraints and the need to file promptly, have filed the motion without including Plaintiffs' position.

Respectfully Submitted,

BRETT A. SHUMATE  
Assistant Attorney General

DREW C. ENSIGN  
*Deputy Assistant Attorney General*

Dated: June 27, 2025

WILLIAM KANELLIS

*Ethan B. Kanter*  
ETHAN B. KANTER  
*Chief, National Security Unit*  
*Office of Immigration Litigation*  
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PAUL F. STONE  
*Deputy Chief, National Security Unit*  
*Office of Immigration Litigation*

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

*Date: June 27, 2025*

By: Ethan B. Kanter  
ETHAN B. KANTER  
*Chief, National Security Unit*  
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